

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

RIKI PAUL JOHNSON,

Plaintiff,

v.

ASHLEY ELIZABETH FLIEHR a/k/a  
ASHLEY FLAIR, a/k/a CHARLOTTE  
FLAIR, RICHARD MORGAN FLIEHR  
a/k/a RIC FLAIR, a/k/a “NATURE BOY”  
FLAIR, BRIAN SHIELDS, and WORLD  
WRESTLING ENTERTAINMENT, INC.  
d/b/a the “WWE”,

Defendants.

**CASE NO. 3:18-cv-00565-GCM**

**JOINT MOTION FOR EXTENSION OF TIME**

Counsel for all parties respectfully move the Court pursuant to Rule 6 of the Federal Rules of Civil Procedure for an additional extension of time within which Plaintiff may file an Amended Complaint and for other relief.

In support of this motion, Plaintiff and the Defendants show the Court as follows:

1. On January 9, 2019, counsel for all parties requested that the Court grant extensions of time for Plaintiff to file an Amended Complaint in this action and for Defendants to respond to such an Amended Complaint, or in the alternative for additional time to respond to the existing Complaint in this action. (Doc. No. 20).

2. Counsel for all parties informed the Court that they believed that additional time was necessary and warranted so that they could discuss the nature of Plaintiff’s claims and

Defendants' defenses in an effort to narrow the parameters of this dispute in the interests of judicial economy.

3. On January 10, 2019, the Court entered its Text-Only Order granting that motion and extended the time in which Plaintiff may file an Amended Complaint until March 15, and extended Defendants' times for filing responses to the existing Complaint or to any Amended Complaint.

4. Since then counsel for the parties have met in person and have conferred at length regarding the issues in this case and believe that a one-week extension of the deadlines set forth in the January 10, 2019 Text-Only Order would enable them to complete those discussions, all in the interests of judicial economy.

5. Accordingly, counsel for all parties respectfully request that the Court grant Plaintiff until and including March 22, 2019 to file an Amended Complaint. Should Plaintiff fail to file an Amended Complaint on or before March 22, 2019, Defendants request an extension until and including April 5, 2019 to move or otherwise respond to the existing Complaint. In the event Plaintiff does timely file an Amended Complaint, Defendants then request that they be granted thirty (30) days from the filing of such Amended Complaint to move, answer, plead, or otherwise respond to Plaintiff's Amended Complaint should one be timely filed.

6. This motion is made for good cause and not for purposes of delay.

WHEREFORE, counsel for all parties respectfully request that the Court: (1) grant Plaintiff leave until and including March 22, 2019 to file an Amended Complaint; (2) grant Defendants an extension of time to move, answer, plead or otherwise respond to the existing Complaint up to and including April 5, 2019, should no Amended Complaint be timely filed; and (3) grant Defendants

thirty (30) days from the filing of such Amended Complaint to move, answer, plead or otherwise respond to Plaintiff's Amended Complaint, should one be timely filed by Plaintiff.

This the 14<sup>th</sup> day of March, 2019.

/s/Jonathan E. Buchan

Jonathan E. Buchan, NC State Bar No. 8205  
Natalie D. Potter, NC State Bar No. 34574  
Attorneys for Defendant World Wrestling  
Entertainment, Inc., d/b/a "WWE", Brian  
Shields and Richard Morgan Fliehr a/k/a Ric  
Flair a/k/a "Nature Boy" Flair  
Essex Richards, PA  
1701 South Blvd.  
Charlotte, NC 28203  
Telephone: (704) 377-4300  
Fax: (704) 372-1357  
Email: [jbuchan@essexrichards.com](mailto:jbuchan@essexrichards.com)  
Email: [npotter@essexrichards.com](mailto:npotter@essexrichards.com)

Consented to and joined in by:

/s/Trey Lindley

Trey Lindley, NC State Bar No. 31650  
Attorney for Plaintiff  
Lindley Law, PLLC  
P.O. Box 30305  
30305 Charlotte, NC 28230  
Telephone: 704-457-1010  
Email: [tlindley@lindleylawoffice.com](mailto:tlindley@lindleylawoffice.com)

/s/C. Amanda Martin

C. Amanda Martin, NC State Bar No. 21186  
Attorney for Defendant Ashley Elizabeth  
Fliehr a/k/a Charlotte Flair  
Stevens Martin Vaughn & Tadych, PLLC  
1101 Haynes Street  
Suite 100  
Raleigh, NC 27604  
Telephone: 919-582-2300  
Facsimile: 866-593-7695  
Email: [amartin@smvt.com](mailto:amartin@smvt.com)